

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PROVIDENT LIFE AND ACCIDENT )  
INSURANCE COMPANY, )

Plaintiff )

v. )

Case No. 08 CV 3227

JILL GARNER, JAN A. MIX, JOY L. )  
MIX and ANGELA L. MANTOVANI, )

Defendants )

**NOTICE OF MOTION**

To: Michael J. Smith	Barrett W. Thies	W. Sebastian von Schleicher
Smith, von Schleicher &	Smith, von Schleicher &	Smith, von Schleicher &
Associates	Associates	Associates
39 South LaSalle Street	39 S. LaSalle Street	39 South LaSalle Street
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Chicago, IL 60603	Chicago, IL 60603	Chicago, IL 60603
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PLEASE TAKE NOTICE that on September 11, 2008, at the hour of 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Joan B. Gottschall in courtroom 2325, or any other judge who may be sitting in her place and stead, Everett McKinley Dirksen Building, 219 South Dearborn Street, Chicago, Illinois, and shall then and there present the **Motion for Entry of Default and Default Judgment**.



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Bernard P. Edelman  
Attorney for Defendants Jill Garner, Jan A.  
Mix and Joy L. Mix

Robert R. Tepper  
111 W. Washington St.  
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(312)251-0031  
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Attorney No. 02948

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Defendants )

**MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

Now come Defendants Jill Garner, Jan A. Mix and Joy L. Mix, by counsel, and hereby move this Honorable Court enter an order defaulting Defendant Angela L. Mantovani and granting a default judgment in favor of Movants and in support thereof states as follows:

1. This Court requested Defendant Mantovani to file her appearance based upon the representation of Plaintiff's counsel that the summons and complaint had been served.
2. There was no appearance or other response for Defendant Mantovani.

Respectfully submitted,



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Bernard P. Edelman  
Attorney for Defendants Jill Garner, Jan A.  
Mix and Joy L. Mix

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(312)519-9900  
Attorney No. 02948

**CERTIFICATE OF SERVICE**

I, the undersigned, a non-attorney certify under penalties of perjury that I caused a copy of the foregoing Notice of Motion and **Motion for Entry of Default and Default Judgment** to be served upon:

Michael J. Smith  
Smith, von Schleicher & Associates  
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by causing true and correct copies of same to be sent by **electronic mail** via the CM/ECF system this 2<sup>nd</sup> day of September, 2008.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 2<sup>nd</sup>, 2008.



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Rebecca Robinson Guinn